

REMARKS

Reconsideration of this Application is respectfully requested.

Claims 1-37 are pending in the application, with claims 1, and 21 being the independent claims. Claims 17-20 and 25-37 are withdrawn from consideration.

Based on the following Remarks, Applicants respectfully request that the Examiner reconsider all outstanding objections and rejections and that they be withdrawn.

Elections/Restrictions

In confirmation of the provisional election made April 15, 2004, Applicants elect, without traverse, claims 1-16 and 21-24 of Group I drawn to a method of managing file-based data. Applicants reserve the right to file a divisional application on the subject matter of non-elected Claims 17-20 and 25-37.

Objections to the Specification

In the Action on page 2, section 4, the Abstract is objected to for having an underlined title and extraneous matter at the bottom of the page. Applicants assert that the Abstract did not contain such markings when filed. However, a clean copy of the Abstract is concurrently submitted to replace the damaged Abstract.

Rejections under 35 U.S.C. § 102

In the Action on pages 5-10, section 6, claims 1-16 and 21-24 are rejected as being anticipated by U.S. Patent No. 5,815,415 to Bentley et al. (hereinafter "Bentley"). Applicants respectfully traverse the rejection.

As per claim 1, Bentley fails to teach at least one limitation of the claim. Claim 1 recites a method of *managing file-based data* which is manipulated by at least one user via *a file-based computerized editor*, the file-based data including a plurality of file elements, the method comprising the steps of: *representing file-based data* as a plurality of individual components, each

individual component having a unique identity and identifier; and storing said individual components in a store.

Bentley as a whole is directed toward providing a **component** oriented CAD system as an improvement over conventional file-based CAD systems. As the background section of Bentley describes, file-based systems are useful in terms of uniformity and predictability of data representation, and for relatively simple engineering models. File-based systems are not sophisticated or flexible enough, however, to maintain the data and organization required by more complex and complete engineering models. Further, collaboration among engineers using different hardware and/or software platforms is difficult, if not impossible, with conventional file-based systems. Bentley therefore introduces a computerized modeling system to represent and manipulate engineering models as components rather than as files.

Bentley fails to teach the management, representation, or editing of **file-based data**. The Action aligns the store file 112 (col. 45, lines 13-15) with the file-based data of claim 1. This alignment is incorrect. The store file 112 is a physical file that serves to save a store in physical storage. The store file 112 is not, however, edited directly, or capable of being edited by file-based editor. In contrast, the file-based data of claim 1 can be directly edited by a file-based editor.

Bentley teaches management of **models**, see, e.g., col. 4, lines 6-14, and use of a **component-based** editor (i.e. the computerized modeling system, or CMS). The CMS of Bentley retrieves, manipulates and changes **models**, not files. See, e.g., col. 5, line 65- col. 6, line 2. In contrast, the present invention, and claim 1 in particular, is directed toward retaining compatibility with conventional file-based systems while offering improvements to the restraints to work-flow that such systems cause. See, for example, paragraphs 0047 and 0056. Therefore, Bentley fails to teach the management, representation, or editing of file-based data. Consequently, claim 1 is allowable, and Applicants respectfully request that the rejection be withdrawn.

Claims 2-16 depend from claim 1 and are allowable as being dependent from an allowable claim.

Further, claim 2 recites wherein step (b) further comprises: storing all of said individual components corresponding to one file of said file-based data in a single store, wherein said single store contains no individual components of a different file of said file-based data. The action states

that Bentley teaches this limitation in col. 44, lines 41-57. This passage, however, describes the structure of project as a grouping of multiple stores. There is no discussion of file-based data or of using a single store to store all of the components corresponding to one file. Therefore, Bentley does not teach the limitation of claim 2.

As per claim 21, Bentley fails to teach at least one limitation of the claim. Claim 21 recites an apparatus for *translating file-based data* which is manipulated by at least one user via a *file-based computerized editor* into a plurality of individual components, the file-based data including a plurality of file elements, said apparatus comprising: (a) a translator that *represents file-based data* as a plurality of individual components, each individual component having (i) a unique identifier, (ii) a set of fields, each field having a data type and a data value, and (iii) a program which interprets and modifies said fields; and (b) a memory for storing said individual components in a store.

Claim 21 recites similar limitations to those in claim 1 and is allowable for at least the same reasons as those given for claim 1.

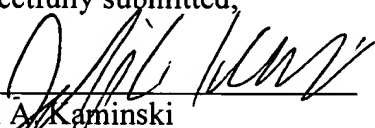
Claims 22-24 depend from claim 21 and are allowable as being dependent from an allowable claim.

Conclusion

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete reply has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is hereby invited to telephone the undersigned at the number provided.

Dated: 8/29/04

Respectfully submitted,

By 
Jeffri A. Kaminski

Registration No.: 42,709

VENABLE LLP

P.O. Box 34385

Washington, DC 20043-9998

(202) 344-4000

(202) 344-8300 (Fax)

Attorney/Agent For Applicant